

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating

Permit: F-08-015

MPD, Inc.

Owensboro, KY 42303

July 16, 2008

Rita Arguello, Reviewer

SOURCE ID: 21-059-00016

AGENCY INTEREST: 929

ACTIVITY: APE20080001

SOURCE DESCRIPTION:

MPD Inc., an existing conditional major source (for HAP) submitted a permit renewal application to its existing F-03-014 permit. MPD Inc. has three subsidiary companies onsite: CMI makes breath-alcohol instrumentation for police departments, MPH makes radar guns for police departments, and MPD Components makes electronics for the Dept. of Defense. All of the companies are electronic in nature and all of MPD Inc.'s customers are either governments or military contractors.

COMMENTS RENEWAL:

Emission Unit 1(): Industries Degreasers

- a. This emission point consists of 5 degreasers.
- b. The worst-case control efficiency of 30% was obtained from AP-42.

Degreaser	Installation Date	Max. amount used	Control Device
Marshall Claude degreaser (model #1618, serial #84-5660)	Pre-1987	90 gallons per year, 0.05 gals per hour	Refrigerated Chiller and Reduced Room Draft
Unique Industries degreaser (model #LP1618, serial #0200590)	Pre-1987	130 gallons per year, 0.10 gallons per hour	Refrigerated Chiller and Reduced Room Draft
Marshall Claude degreaser (model #1618, serial #34396-2)	Pre-1987	49 gallons per year, 0.03 gallons per hour	Refrigerated Chiller and Reduced Room Draft
Tiyoda-Serec Degreaser (serial #062)	2003	1 gallons per year, 0.0005 gallons per hour	Refrigerated Chiller and Reduced Room Draft
SonBlaster Degreaser Series 600	2005	0.4 gallons per year, 0.0002 gallons per hour	Refrigerated Chiller and Reduced Room Draft

- c. Applicable requirements were obtained from 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning.

- d. Standard language has been updated to this permit.
- e. Emission factor subject to subpart T and AP-42.

Degreaser equipment and usage has been changed during the period of this current permit, but they will continued to use 5 units. Potential to emit for the solvent cleaning machines using Trichloroethylene is calculated based on 40 CFR 63 subpart T. The solvent vapors are condensed with a refrigerated chiller but the cooling coils are not in direct contact with the degreasing chamber as in traditional degreasers.

The five boiler units that will remain in use have a total rated capacity of 15.478 MMBtu/Hr; with applicable regulation 401 KAR 59:015, New indirect heat exchangers. The facility uses the following boilers:

63106 Cleaver Brooks Boiler (6.275 mmBTU/hr & 1975)

39739 Sellers Boiler (4.185 mmBTU/hr & 1999)

36878 Highlander Boiler (1.031 mmBTU/hr & 1986)

71912 Fulton Boiler (1.594 mmBTU/hr & 2005)

71911 Fulton Boiler (1.993 mmBTU/hr & 2005)

The following boilers are insignificant activities:

18584 Basmor Boiler

6035 Basmor Boiler

34476 Weil McLain Boiler

The facility boiler Spare: 35789 Weil McLain Boiler

EMISSION AND OPERATING CAPS DESCRIPTION:

Trichloroethylene, TCE, (HAP) emissions from each solvent cleaning machine (degreaser) shall be equal to or less than 150 kilograms/square meter/month on a 3-month rolling average.

The facility-wide annual emissions of Trichloroethylene, TCE, shall be less than 14,000 Kg/yr. TCE is the only solvent used. Per 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning, May, 2007.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.